

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

vs.

Case No. 20-CR-26

YOUSEF BARASNEH,

Defendant.

**UNOPPOSED MOTION TO AMEND CONDITIONS OF
RELEASE TO ALLOW FOR TRAVEL OUT OF DISTRICT**

Yousef Barasneh moves this Court to amend his conditions of release to allow him to travel out of the district from Thursday, November 10, to Monday, November 14, 2022. As grounds for this motion, undersigned counsel states the following:

1. Yousef Barasneh was released to bond at his initial appearance on January 17, 2020. He entered a guilty plea on August 12, 2020 to count one of the Information. Barasneh had several early troubles with testing positive for marijuana use, however since at least August 2021, he has remained compliant. Just this month he was removed from electronic monitoring based on his longstanding compliance with that condition of his release

2. Barasneh would like to again travel to Nekoosa in the Western District of Wisconsin. Undersigned counsel has previously provided the exact address of his

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destination to the government and to the United States Probation Office. For several days, he and a friend plan to enjoy the outdoors and go (bow) deer hunting.

3. Earlier today, undersigned counsel communicated with Assistant United States Attorney Ben Taibleson who indicated that the government has no objection to Barasneh's request.

For these reasons, Barasneh respectfully asks this Court to amend his conditions of release to allow him to travel outside the district from Thursday, November 10, to Monday, November 14, 2022. Should the Court grant this request, Barasneh will provide any additional details requested by the probation department and will contact his agent upon return to the Milwaukee area.

Dated at Milwaukee, Wisconsin, this 8th day of November, 2022.

Respectfully submitted,

/s/ John W. Champion

John W. Champion, WI Bar #1002697

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